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ABS-CBN INTERNATIONAL
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11 IN THE UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 ALEC TABAK,

14 Plaintiff,

15 v.

16 ABS-CBN INTERNATIONAL,

17 Defendant.
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Case No. 4:19-cv-05202-YGR

**THIRD STIPULATION TO EXTEND
TIME FOR DEFENDANT ABS-CBN
INTERNATIONAL TO RESPOND TO
COMPLAINT PURSUANT TO CIVIL
LOCAL RULE 6-1(a)**

WHEREAS Plaintiff filed this action on August 20, 2019;

WHEREAS the deadline for Defendant ABS-CBN International (“ABS-CBN”) to respond to the Complaint is November 13, 2019;

WHEREAS Defendant requires additional time to investigate the allegations of the Complaint and prepare its responsive pleading;

WHEREAS the parties continue to explore settlement, and agree that a further continuance of Defendant’s time to respond is beneficial to those efforts; and

WHEREAS this stipulation will not alter the date of any event or any deadline already fixed by Court order.

NOW THEREFORE, Plaintiff Alec Tabak and Defendant ABS-CBN International HEREBY STIPULATE AND AGREE AS FOLLOWS:

The deadline for ABS-CBN International to answer or otherwise respond to the Complaint shall be extended up to and including November 27, 2019.

IT IS SO STIPULATED.

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP
Burt Braverman
Thomas R. Burke

Dated: November 12, 2019

By: /s/ Thomas R. Burke
Thomas R. Burke

Attorneys for Defendant
ABS-CBN INTERNATIONAL

LIEBOWITZ LAW FIRM, PLLC
Richard P. Liebowitz

Dated: November 12, 2019

By: /s/ Richard P. Liebowitz
Richard P. Liebowitz

Attorneys for Plaintiff
ALEC TABAK

CERTIFICATION OF CONCURRENCE

Pursuant to L.R. 5-1, I hereby attest that Richard P. Liebowitz, counsel for Plaintiff Alec Tabak, has provided his concurrence in the electronic filing of the foregoing document entitled STIPULATION TO EXTEND TIME FOR DEFENDANT ABS-CBN INTERNATIONAL TO RESPOND TO COMPLAINT PURSUANT TO CIVIL LOCAL RULE 6-1(a).

/s/ Thomas R. Burke

Thomas R. Burke